

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUNAID SAHIBZADA,
[DOB: 04/07/1986]

Defendant.

Case No. 23-00177-01-CR-W-BP

COUNT ONE:

(Failure to File Form 8300)

31 U.S.C. § 5324(b)(1)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

FORFEITURE ALLEGATION:

31 U.S.C. § 5317(c)(1)

\$100 Mandatory Assessment

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

On or about the dates between and including January 28, 2021, and April 28, 2021, in the Western District of Missouri and elsewhere, the defendant, JUNAID SAHIBZADA, did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331 and the regulations prescribed thereunder, caused Gold N Time, a nonfinancial trade or business, to fail to file a report required under the aforementioned statute and regulations, in that the defendant, while operating in his capacity as owner and operator of Gold N Time, received \$21,100 in United States currency in two or more related transactions, and failed to file a Form 8300 as required.

All in violation of Title 31, United States Code, Section 5324(b)(1) and Title 31, Code of Federal Regulations, Part 103, Section 1010.330.

ALLEGATION OF FORFEITURE

As a result of the offense alleged in this Information, and pursuant to Title 31, United States Code, Section 5317(c)(1), the defendant shall forfeit to the United States all property, real or personal, involved in the offense and any property traceable thereto as a result of the offense incorporated by reference in this allegation, including, but not limited to: a money judgment in the amount of \$21,100, which the defendant admits represents property involved in the offense.

Substitute Assets

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Section 5317(c)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

Teresa A. Moore
United States Attorney

By /s/ John Constance

John Constance
Assistant United States Attorney